

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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JAMES AND ELIZABETH PISA : CHAPTER 13

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Debtor(s) : CASE NO. 5-18-04767

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**DEBTOR'S ANSWER TO TRUSTEE'S MOTION TO DISMISS**

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AND NOW COMES, James and Elizabeth Pisa, the Debtor, and files an Answer to the Trustee's Motion to Dismiss and states the following:

1. James and Elizabeth Pisa, (hereinafter the "Debtor") filed a Chapter 13 bankruptcy proceeding with the U.S. Bankruptcy Court for the Middle District of Pennsylvania.
2. Charles J. DeHart, III, Esq. is the standing Chapter 13 Trustee.
3. The Trustee filed a Motion to Dismiss the Debtor's Chapter 13 case for failure to file the necessary documents.
4. Debtors' Counsel is waiting for information from the Debtor. Mrs. Pisa's paystubs will be filed with the Court shortly.

WHEREFORE, the Debtor respectfully requests that Trustee's Motion to Dismiss be denied.

Respectfully submitted,

Date December 11, 2018

/s/Tullio DeLuca

Tullio DeLuca, Esquire

PA ID# 59887

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**CERTIFICATE OF SERVICE**

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The undersigned hereby certifies that on December 11, 2018, he caused a true and correct copy of Debtor's Answer to Trustee's Motion to Dismiss to be served via electronic filing in the above-referenced case, on the following:

Charles J. DeHart, III, Esq. at [dehartstaff@ramapo.com](mailto:dehartstaff@ramapo.com)

Dated: December 11, 2018

/s/Tullio DeLuca  
Tullio DeLuca, Esquire